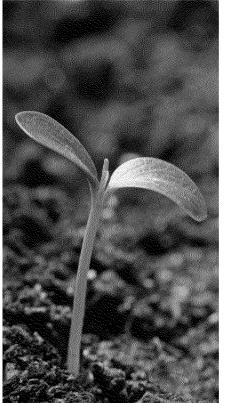


Oak Ridge Reservation: Development of Site-specific Fish Consumption Rate for Recreational Use of Bear Creek

November 30, 2021





Outline

- Objective and Overview of Technical Approach
- Technical Aspects
 - Radionuclides of interest
 - Fish Sampling Design & Fish Community Survey Results
 - Key Parameter Inputs
 - Site-specific Equations and Example Calculations
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Objective and Overview of Technical Approach

- Develop site-specific risk-based cleanup levels for radionuclides discharged from the existing landfill and proposed landfill (EMDF) into surface water for radionuclides associated with the waste streams.
 - Protect state-designated use = recreational
 - 10⁻⁵ risk level
 - LUCs (signage, DOE land use designations) are not considered
- Challenge: no existing promulgated standards for radionuclides (i.e., no existing state or federal AWQCs)
- A formal dispute per the Oak Ridge Federal Facilities Agreement was settled by the 12/31/21 Wheeler Decision.
- Use standard equation to develop risk-based values, substituting site-specific factors where appropriate.

Comparison of DOE, CWA and CERCLA Parameters

Two deviations from Office of Water guidance (other parameters consistent with OW guidance)

Combined 8fold difference

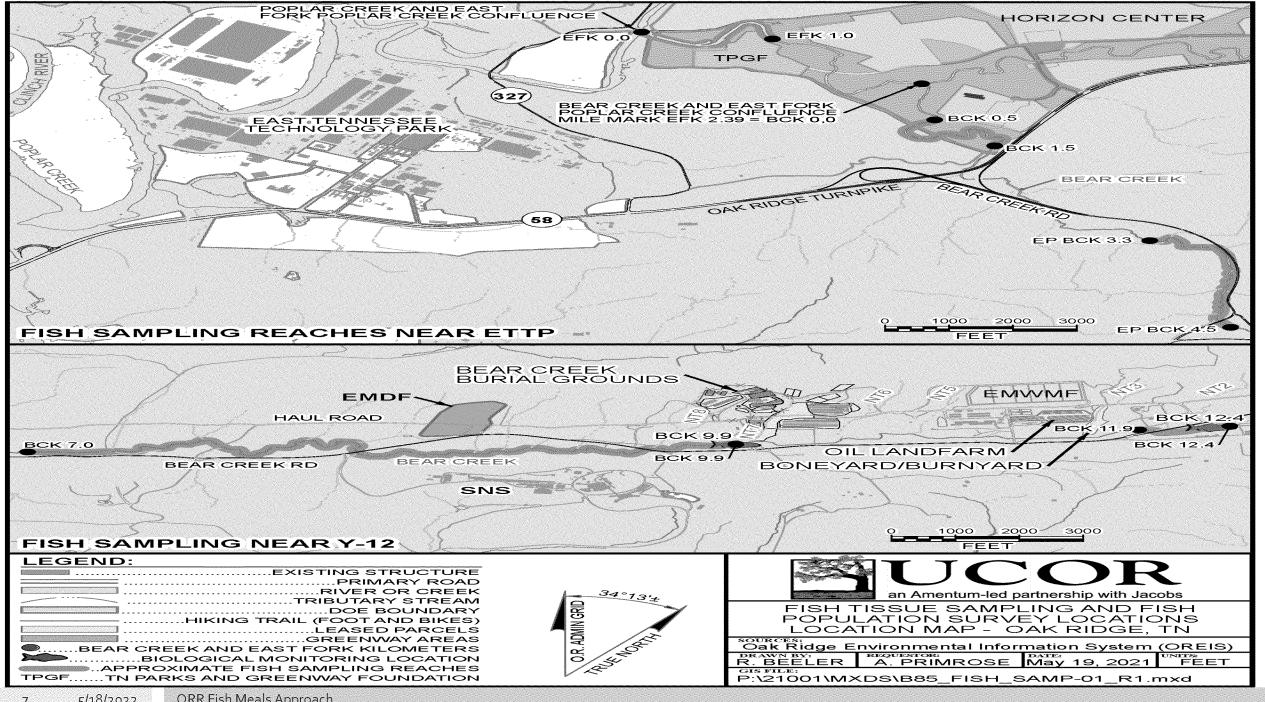
Variable Variable	DOE Method		EPA CWA Method		EPA CERCLA Method	
	Value	Source	Value	Source	Value	Source
Target Risk (TR), unitless	1X10 ⁻⁵	TDEC default	1X10 ⁻⁵	CWA default	1X10 ⁻⁵	Within SF acceptable risk range (10 ⁻¹ to 10 ⁻⁶)
Exposure Duration – Fish (EDf), years	30	Discontinued CERCLA default	70	CWA default	26	SF default; rationale based on 20- year landfill life cycle
Fish Ingestion Rate (FIR), grams/year	170	Professional Judgement; 1 single 6-oz fish meal per year	8,030 (8-oz meal; 227 g/meal; equivalent to 34 meals/year)	CWA default	2,500 (8-oz meal; 227 g/meal; equivalent to 11 meals/year)	SF site- specific (no SF default for recreational use)

Technical Aspects

- Evidence-based, scientific computational approach (total fish biomass)
 - 22 radionuclides were selected based on waste stream for existing and new landfill
 - Fish tissue data collection to determine baseline/existing risk
 - # Edible fish (defined as >30 grams wet weight)
- Follows standard CERCLA risk assessment protocols
 - Accounts for radionuclide parent and key daughters/progeny. CWA and OW does not include radionuclide progeny.
 - Robust fish tissue data sets (Spring 2021 fish sampling + last 5-YR biomonitoring)
 - Not a negotiated estimate and does <u>not</u> consider LUCs, posted signage, proximity to more favorable fishery or angling in other fisheries
- Applies information from several credible sources of information
 - Spring 2021 fish tissue sampling & fish community survey (EPA approved Work Plan)
 - Last 5 years (2016-2020) of fish counts & total biomass at the nearest stream reach location
 - TN Wildlife Resource Agency's (TWRA) Melton Hill Creel Survey Report (TWRA 2019)
 - TDEC's Roving Creel Study (ongoing; anticipated completion is late 2022)
 - Burger et al. (2008) fish consumption study along the Clinch River arm of Watts Bar Reservoir adjacent to ORR

Fish Sampling Design

- Three points of exposure (stream reach locations) identified based on observed fishing activity, access to creek or other evidence of fishing
 - BCK 3.3 4.5 (nearest stream reach to point of discharge)
 - BCK 0.5 1.5 (mid-point location in Bear Creek)
 - **EFK o.o 1.o** (furthest downstream location at the confluence of East Fork Poplar Creek and Poplar Creek)
- EFK 0.0-1.0 included in sampling to help bound any radionuclide risk in Bear Creek, but not factored in fish meals calculation
- Electrofishing technique captured most fish with multiple passes
 - Tissue from some smaller fish (<30 grams) used to make up biomass needed for radionuclide analysis



Fish Community Survey Results

- Spring 2021 fish counts and biomass
- Similar fish density and biomass in Bear Creek and reference location (BFK)

Stream Reach Location	Fish Counts	Total Weight of Edible Fish (>30 grams)	Notes
BCK 3.3 - 4.5	(shallow depths; habitat most suitable for smaller sized fish (e.g., sunfish))	38	Supplemented fish count with last 5-year BMAP data, which increased fish population to 27 and total edible biomass to 99.2 grams (95 th upper percentile)
BCK 0.5-1.5	12	682	
EFK 0.0-1.0	25	1,780	
BFK 7.6	10	652	Background reference location

Key Inputs in Fish Meals Calculation

- **Fish count** (considerations for weight and length-to-weight ratio; edible fish defined as >30 grams wet weight)
- **Total Biomass** stream reach specific
- Exposure duration 26 years
- Number of fishing trips 30 fishing trips [Melton Hill creel data; 4 fishing trips per month over 6 months (late Spring, Summer and Fall) and 2 trips per month over three months]
- Edible fish proportion (fish yield) 50% (upper end for fish yield; literature-based value; average yield ranges from 28-50%)
- Fish catch effort 7 fish per hour (unaffected by fish density)
- Fish catch success rate (expressed as a percentage) stream reach specific

Catch Success Rate Extrapolation

- A measure of fishing success (catch per unit of fishing effort)
 - A key determining factor in number of fish meals at a given stream reach location
 - A function of catch effort and total biomass

Total catch = Total effort x Average catch rate

Hoenig J.M. et al. 1997. *Calculation of Catch Rate and Total Catch in Roving Surveys of Anglers, Biometrics* 53:306-317 (March 1997)

- 2019 TWRA Creel Survey Report for Melton Hill used as a conservative measure of fishing effort in a day
 - Catch Range per hour over a 6-hour fishing trip (Melton Hill) = 0.14 2.05 catch per hour
 - 95% Upper Confidence Limit on the Mean = 1.213 catch per hour

Fish Caught (per hour) = 1.213 fish per hour x 6 hours = 7.28 fish per fishing trip

Catch Success Rate Extrapolation (cont'd)

For BCK 0.5 – 1.5:

- Fish Catch Success Percentage = Fish catch per hour / Total Fish Count (TWRA 2019)
- = 7 fish catch per hour / 12 total fish x 100%

= 58% fish catch per trip

- Annual Fish Catch (in grams/year) = Edible fish biomass (g/yr) \times Average Fish Catch Success Percentage for BCK (BCK 3.3-4.5 and BCK 0.5-1.5) (%) \times Total # Fishing Trips
- = 341 grams/year x 0.43 x 30 fishing trips/year

= 4,400 grams/year

- Number of Fish Meals (per year) = Total Biomass / Biomass per fish
- = 4,400 grams/year / 227 grams/meal

= 19.3 fish meals/year

Number of Fish Meals

= 2.8 fish meals/year

Wrap-Up

- Contrary to DOE's claim, sizable and edible fish are present in Bear Creek.
- Three-fold difference in fish meal estimate for CERCLA (2,500 g/yr) versus CWA (8,030 g/yr) methods
- 11 fish meal estimate is within the CERCLA risk range for 22 radionuclides
- Region 4 methodology includes radionuclide parent and key progeny/daughters consistent with the waste stream
- Total biomass and species density for Bear Creek is within the range of measurements observed by the BMAP for Brushy Fork creek and two other reference locations
- Spring 2021 fish tissue data shows no statistically significant difference in concentrations when compared to fish tissue data in the study's reference location (BFK)
- No detectable radionuclides in fish tissue reported above the target fish tissue Preliminary Remediation Goals (TR = 10⁻⁵)

Questions

Additional information (12-01-2021)

- The 22 radionuclides of concern are Atomic Energy Act (AEA) materials; they are byproducts of nuclear fission.
- Several of the radionuclides of concern are unique to nuclear fission and are not generally present in the environment, including Technicium-99, Europium-154, Plutonium-238, Plutonium-239, Neptunium-237, Cobalt-60, Cesium-137 and Stronium-90.
- Several of the radionuclides of concern have relatively short half-lives and would not be expected to persist in the environment beyond the 26-year exposure duration.